Message

From: Strynar, Mark [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A9910D5B38E471497BD875FD329A20A-STRYNAR, MARK]
Sent: 12/11/2019 3:50:56 PM
To: Post, Gloria [Gloria.Post@dep.nj.gov]
CC: McCord, James [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=McCord, James]; Lindstrom, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=04bf7cf26aa44ce29763fbc1c1b2338e-Lindstrom, Andrew]; Washington, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdc3e8ce9f1d45c4894881ff420ca104-Washington, John]
Subject: RE: Information on toxicity of Solvay replacement compounds CONFIDENTIAL
Attachments: replacement info draft deliberative and CBI.1.docx

Gloria,

Going through some old emails. I cant find any info on the Ex. 4 CBI you point out below and in the in the attached document. In the link on your attachment https://www.govtrack.us/congress/bills/115/s2108/text

When I search for Ex. 4 CBI I find no info for this CAS#s in Scifinder which is from CAS.

I can find Ex. 4 CBI but no structures are shown and they appear to be what is called Fomblin or Galden.

Mark

From: Post, Gloria <Gloria.Post@dep.nj.gov>
Sent: Friday, May 10, 2019 3:11 PM
To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>; Lau, Chris <Lau.Christopher@epa.gov>; Washington, John <Washington.John@epa.gov>
Cc: Bergman, Erica <erica.bergman@dep.nj.gov>; Goodrow, Sandra <Sandra.Goodrow@dep.nj.gov>
Subject: Information on toxicity of Solvay replacement compounds CONFIDENTIAL
Importance: High

Mark, Andy, John, and Chris,

Solvay recently submitted information to NJDEP about the replacement PFAS they are using at their NJ facility. Although some of it is marked as Confidential Business Information, Erica told me that it can be shared with you since it is relevant to your study of non-target PFAS in NJ.

Solvay provided Ex. 4 CBI that they used/are using in NJ. The

Ex. 4 CBI

- Ex. 4 CBI

Ex. 4 CBI

We are not aware of any data on the bioaccumulation (e.g. half-life) of the Solvay replacement PFASs in animals or humans, and data on toxicokinetics, including human and animal half-lives etc. are not shown on MSDSs. However, other PFAS with generally similar structures are known to bioaccumulate in humans, including those found in the "GenX Exposure Study" in North Carolina, and also the PFAS found in "F 53B", a replacement for PFOS in metal plating (Shi et al., 2016).

Adding to the concern about these PFAS is other information provided by Solvay showin Ex. 4 CBI

Ex. 4 CBI

Gloria

From Ex. 5 Deliberative Process (DP)
Sent: Wednesday, May 01, 2019 6:07 PM
To: Post, Gloria <Gloria.Post@dep.nj.gov>
Cc: Olawski-Stiener, Joan <Joan.Olawski-Stiener@dep.nj.gov>
Subject: [EXTERNAL] Re: Toxicology information requested from Solvay

Ex. 5 Deliberative Process (DP)

Thanks again for all your time today, I along with the rest of the special counsel team am tremendously grateful!

Sent from my iPhone

On May 1, 2019, at 6:04 PM, Post, Gloria <Gloria.Post@dep.nj.gov> wrote:

CAUTION External Email

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thank you!

Gloria

From: Gloria Post
Sent: Thursday, September 18, 2014 5:24 PM
To: Gary Buchanan
Subject: Toxicology information requested from Solvay

As requested, I have summarized the PFNA toxicology information that was requested from Solvay but has not been provided. I have email correspondence with Virginia Hubert of Solvay about these requests.

1. Solvay said that 6 studies on PFNA and/or the Surflon S-111 PFC mixture consisting primarily of PFNA (with lower amounts of PFOA, C11, and C13) were conducted by a trade association, Society of Plastics Industry, and funded by three companies including Solvay. These studies were requested but were not provided.

2. Two toxicology studies of the Surflon S-111 mixture sponsored by Solvay and other industries have been published:

Mertens JJ, Sved DW, Marit GB, Myers NR, Stetson PL, Murphy SR, Schmit B, Shinohara M, Farr CH. Subchronic toxicity of S-111-S-WB in Sprague Dawley rats. Int J Toxicol. 2010 Jul;29(4):358-71.

Stump DG, Holson JF, Murphy SR, Farr CH, Schmit B, Shinohara M. An oral two-generation reproductive toxicity study of S-111-S-WB in rats. Reprod Toxicol. 2008 Jan;25(1):7-20.

- In these papers, the percentage of each in the test material is not stated. This information was requested from Solvay but not provided.

- In Mertens et al. (2010), the serum levels of PFNA, PFOA, C11, and C13 are presented graphically in Figures 2, 3, and 4. Due to the scale of the graph, it is not possible to estimate the values at the lower dose levels from the graphs. The numerical data for the information presented in the graphs is needed to determine the serum levels at which effects occurred. The numerical data were requested from Solvay but not provided.

- In Stump et al. (2008), data for total Surflon S-111 in serum is shown graphically (Figure 3), but information on serum levels of each PFC (PFNA, PFOA, C11, and C13) is not shown. This information, in numerical form, was requested from Solvay but not provided.

3. The study entitled "WIL Research Laboratories, LLC. Study number WIL-497002, 2006" is cited in Mundt et al. 2007. Clinical epidemiological study of employees exposed to surfactant blend containing perfluorononanoic acid. Occup. Environ. Med. 64: 589-594. Attempts to obtain the Wil Research Laboratories study from Solvay and from the sponsor of the Mundt et al. paper, Environ Corporation, were not successful.

<MertensSurflonSubchronic.pdf>

<stump et al surflon C9 oral 2 generation rat.pdf>

<Mundt 2007 Clinical_epidemiological_study_of_employees_expose.pdf>

<Graber et al. 2018.pdf>

Ex. 5 Deliberative Process (DP)